

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Midland Funding LLC,)	CASE NO.: 3:08-cv-01434
)	
Plaintiff,)	JUDGE: Katz
)	
vs.)	
)	
Andrea Brent,)	
)	
Defendant,)	
)	
vs.)	
)	
Midland Credit Management, Inc.)	
)	
Third-Party Defendant)	
)	

**Joint Motion to Amend the
Scheduling Order**

Now come the parties Plaintiff Midland Funding, LLC, Defendant, Andrea Brent, and Third-Party Defendant Midland Credit Management, Inc., and hereby requests that this Court modify the following provisions that were included in the scheduling order issued on August 7, 2008:

- Discovery Deadline(Liability Only) From 10/3/2008 to 12/3/2008

- Dispositive Motions Filing
 Deadline From 10/21/2008 to 1/12/2009

In support of this motion, the Parties state that this modification is not being requested for the purposes of delay or prejudice, but rather, that they require additional time to more fully develop their claims and defenses. Despite the parties' diligence in conducting discovery, it has become apparent that review of documents to be produced and the scheduling of the necessary depositions cannot be completed before the set dates.

Respectfully Submitted,

/s/ R. Glenn Knirsch

R. Glenn Knirsch (0080770)
Javitch, Block, & Rathbone, LLP
1100 Superior Ave., 19th Floor
Cleveland, Ohio 44114
Ph: (216) 623-0000 ex. 3088
Fax: (216) 525-4962
E-mail: GKnirsch@JBandR.com
Attorney for Midland and MCM

/s/ Donna J. Evans

Donna J. Evans (0072306)
Murray & Murray Co., LPA
111 E. Shoreline Drive
Sandusky, OH 44870
Ph: (419) 624-3000
Fax: (419) 624-0707
E-Mail: dae@murrayandmurray.com
Attorney for Defendant Andrea Brent